

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**RECEIVED**

AUG 28 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Stations.  
(Tumon, Guam)

To: Chief, Allocations Branch )

MM Docket No. 98-113  
RM-9296

**COMMENTS OF INTER-ISLAND COMMUNICATIONS, INC.**

Inter-Island Communications, Inc. ("Inter-Island"), by its attorney, pursuant to Sections 1.415 and 1.420 of the Commission's rules, respectfully submits herewith its comments with respect to the Commission's Notice of Proposed Rule Making in this matter, DA 98-1325, released July 10, 1998 (the "NPRM").

In its NPRM, the Commission proposed to allot Channel 280A at Tumon, Guam. Inter-Island is the licensee of station KZMI(FM), San Jose, Saipan, which also operates on Channel 280. Submitted herewith is an engineering statement of Dean H. Reed, Inter-Island's chief engineer. Therein, Mr. Reed indicates that although the proposed allotment meets the Commission's standard separation requirement, interference with KZMI is anticipated based upon the salt water path which separates the locations and a similar type of interference which KZMI had experienced with a co-channel station on Guam, which compelled it to change its frequency to its present channel.

Fortunately, due to Guam's small size and general isolation from other FM facilities, there are a significant number of alternate frequencies which could be assigned to Tumon

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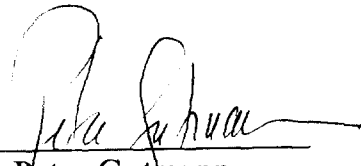
ENCLOSURE

which would avoid the problems highlighted in Mr. Reed's statement. Accordingly, Inter-Island respectfully suggests that another frequency be selected for this allotment in lieu of the proposed Channel 280A.

Respectfully submitted,

**INTER-ISLAND COMMUNICATIONS, INC.**

By: \_\_\_\_\_

  
Peter Gutmann  
Its Attorney

**PEPPER & CORAZZINI, L.L.P.**  
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August 28, 1998

**Comment on Notice of Proposed Rule Making**  
**MM Docket No. 98-113**

**On Behalf of Inter-Island Communications**

1. Inter-Island Communications Inc. is the licensee of radio station KZMI in San Jose, Saipan. KZMI operates on an assigned frequency of 103.9 MHz (Channel No. 208)
2. When the present KZMI was first acquired by Inter-Island Communications the station was assigned to frequency 93.9 MHz. This frequency was at that time in use by KUAM-FM in Agana, Guam. KUAM-FM was operating at an ERP of 2.5 KW, however it's signal on Saipan was sufficient to cause interference to KZMI's signal. The Commission was petitioned and subsequently granted a change of frequency so that KZMI could operate on 103.9 and eliminate this interference problem.
3. The commission now has before it a petition by Guam Broadcast Services Inc. to allocate Channel No. 280 (103.9 MHz) for the proposed operation of a new commercial FM broadcast facility.
4. Inter-Island Communications Inc. opposes this allocation of Channel No. 280 on Guam because of potential interference that will be caused to KZMI's signal on Saipan. Although the term "potential" is used, it is well known here that FM stations on Saipan can be heard on Guam, and that FM stations on Guam can be heard on Saipan. Although these two locations are over 100 miles apart, this is a fact which has been established and acknowledged by the Commission in the past by granting a change of frequency to KZMI in the past.
5. Although this petition meets the Commissions requirements for minimum distance separation, and engineering analysis indicates that there will be no conflict between KZMI on Saipan and this proposed facility the actual facts of the matter indicate otherwise, and indeed these two facilities will interfere with each other. They are separated by sea water which I believe facilitates the propagation of their respective signals.
6. In summation, I would like to point out that the Commissions granting of a frequency change in the past to KZMI due to same channel interference from a station on Guam, coupled with the actual propagation of FM signals between Guam and Saipan precludes the assignment of this channel to Guam. Further more I would also like to point out that there are many vacant channels available for a new facility to operate on. In conclusion, on additional factor that the Commission should be cognizant of is the fact that KZMI has recently been granted a construction permit to relocate it's transmission antenna to the summit of Mt. Tapochau. This would further aggravate problems for the proposed facility on Guam.

Respectfully Submitted

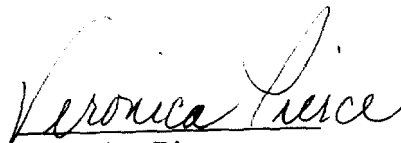
A handwritten signature in black ink, appearing to read "Dean H. Reed". The signature is fluid and cursive, with a large initial "D" and "R".

Dean H. Reed  
Chief Engineer  
Inter-Island Communications

**CERTIFICATE OF SERVICE**

I, Veronica Pierce, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that true copies of the foregoing "Comments of Inter-Island Communications, Inc." were served this 28th day of August, 1998, by U.S. first class mail, postage prepaid, to the following:

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Veronica Pierce